

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
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In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**SEMI-FINAL APPLICATION FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES TO GENOVA BURNS, LLC
FOR THE PERIOD APRIL 4, 2023 THROUGH AUGUST 11, 2023**

TO: THE HONORABLE MICHAEL B. KAPLAN
UNITED STATES BANKRUPTCY JUDGE

The Application of GENOVA BURNS LLC (“Genova Burns”), local counsel to the Official Committee of Talc Claimants (“TCC”), respectfully states to the Court as follows:

1. The members and associates of Genova Burns are all attorneys at law of the State of New Jersey and are duly admitted to practice before this Court.
2. On April 4, 2023, the Debtor filed a Voluntary Chapter 11 Petition in the United States Bankruptcy Court for the District of New Jersey [dkt #1].
3. On April 14, 2023, a Notice of Appointment of the Official Committee of Talc Claimants was entered [dkt #162]. Genova Burns was retained to serve in the capacity of local counsel to the Official Committee of Talc Claimants by Order of this Court dated June 12, 2023 [dkt #754], which retention was effective April 14, 2023. A copy of such retention Order is annexed hereto as Exhibit "A".
4. The within Application represents Genova Burns’ Semi-Final Application for Compensation as local counsel to TCC and covers the period April 14, 2023 through August 11, 2023, as well as time and expenses for the period April 4, 2023 through April 14, 2023. There is currently a motion before this Court [docket #1241] allowing the effective date of the retention of the TCC professionals to be August 4, 2023, or alternatively, to allow the fees and expenses for such period as a substantial contribution to this bankruptcy case. Pursuant to the August 11, 2023 Dismissal Order, additional fees may be sought for services related to appeals. If such additional fees are sought, an additional final fee application will be filed seeking such fees.

5. Genova's computerized time sheets, previously filed with the Monthly Fee Statements covering the Application Period (as referenced below), detail the services rendered by the members and associates of Genova, the hourly rate charged by each member, associate or paralegal, and the actual time expended in the performance of such services. Attached herewith as Exhibit "B" are the timesheets of fees and expenses covering the period April 4 through April 14, 2023. Said time sheets reflect that Genova Burns has expended 1,698.70 hours in performing services for TCC, resulting in charges of \$1,137,165.00. The blended hourly rate charged herein is \$669.43 which your applicant believes is fair and reasonable in light of the nature of the services rendered and the expertise of the professionals rendering such services.

6. As previously submitted with the monthly fee statements and in the attached Exhibit B, out of pocket disbursements incurred by Genova Burns in the performance of its duties as local counsel to TCC total \$32,548.92.

7. Monthly Fee Statements were prepared and served pursuant to the Administrative Fee Order Establishing Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals entered on May 22, 2023.

Date	Fees	Less 20%	Fee Payment Requested	Expense Reimbursement (100%)
April 14-May 31, 2023 (Dkt #766)	\$508,280.00	(\$101,656.00)	\$406,624.00	\$3,723.53
June 2023 (Dkt #1043)	\$301,097.50	(\$60,219.50)	\$240,878.00	\$15,219.84
July 2023 (Dkt #1196)	\$178,680.00	(\$35,736.00)	\$142,944.00	\$4,723.01

August 1-11, 2023 (Dkt #1276)	\$63,472.50	(\$12,694.50)	\$50,778.00	\$8,512.84
Substantial Contribution Motion (Dkt #1241)	Total Fees requested \$85,635.00	-0-		\$369.70

8. Annexed hereto and made part hereof as Exhibit "C" is the Affidavit of Daniel M. Stolz, submitted in accordance with the provisions of Section 504 of the Bankruptcy Code.

9. During the period covered by the within fee application, your applicant continued to perform a variety of services for the creditors of the within Chapter 11 bankruptcy estate.

10. This fee application covers the period from the commencement of the second LTL Chapter 11 filing, through the entry of the Order dismissing the within Chapter 11 case.

11. During the period in question, your applicant provided a variety of services to the Official Committee of Talc Claimants (the "TCC"), both as co-counsel to the TCC, and has local counsel to the TCC.

12. Your applicant was involved in almost every aspect of this compressed, large and complicated Chapter 11 case.

13. During the period covered by the within fee application, your applicant reviewed and filed all pleadings on behalf of the TCC, attended all hearings, participated in all depositions, and prepared and participated significantly in the trial of the motion to dismiss, which resulted in the entry of the Order of this Court dismissing the within Chapter 11 case.

14. During the period in question, your applicant also communicated regularly with the TCC, other TCC professionals, counsel for creditors, the Office of the United States Trustee, the Debtor's professionals, the professionals retained by the FCR, and professionals retained by the

Ad Hoc Committee. Your applicant also regularly communicated with counsel for the various state entities asserting claims against the Debtor.

15. The services performed by your applicant were essential, necessary and comprehensive in nature, and provided significant benefit to this bankruptcy estate and its creditors.

WHEREFORE, Genova Burns respectfully requests the entry of the annexed Order, granting a semi-final allowance of compensation in the amount of \$1,137,165.00, together with reimbursement of actual out-of-pocket disbursements in the amount of \$32,548.92, for a total award of \$1,169,713.92.

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz
DANIEL M. STOLZ

Dated: September 8, 2023